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January 16, 2004

Federal Housing Finance Board
1777 F Street, NW
Washington, DC 20006

Re: Registration of each Federal Home Loan Bank of a Class of its securities under the
Securities Exchange Act of 1934 (68 FR 54396 of September 17, 2003)

Dear Sir or Madam:

The New Jersey League of Community Bankers* ("the League") supports enhanced financial disclosure by the Federal Home Loan Banks ("FHLBanks"). We are, however, committed to ensuring that changes to the disclosure process not interfere with the FHLBanks' ability to provide low-cost advances. Those advances are an important factor in enabling League members to offer competitive home mortgages, community development loans and other essential services to their communities. We do not believe the Finance Board's proposal will produce an enhanced FHLBank disclosure system. We further believe that unless important operational and accounting problems are resolved, proceeding with the proposal could disrupt the FHLBank System's access to the capital markets. It would also expose directors of the FHLBanks to all of the risks that accompany registration with the Securities and Exchange Commission ("SEC") without a clear understanding of the operational and accounting issues SEC registration raises. Additionally, we do not believe the Finance Board has the statutory authority to force FHLBanks to "voluntarily" register with the SEC. We therefore urge that the proposal be withdrawn.

Instead of proceeding with the proposal, we encourage the Finance Board to develop its own enhanced disclosure requirements for the FHLBanks that recognize the cooperative nature of the FHLBank System. The Finance Board clearly has the statutory authority for this approach to ensure the safety and soundness of the FHLBanks. Following this approach would avoid the legal and operational problems that would be encountered with SEC registration.

This matter is of great importance to our members and we appreciate the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'Samuel J. Damiano'.

Samuel J. Damiano
President
SJD\js

* The New Jersey League of Community Bankers is a trade association representing 71 of New Jersey's savings banks, savings & loan associations and commercial banks with total assets of over \$60 billion. The League's wholly-owned subsidiary, the Thrift Institutions Community Investment Corporation ("T.I.C.I.C.") assists League members in forming consortia to make loans on low-to-moderate income housing and economic development projects throughout New Jersey. T.I.C.I.C. has facilitated loans on over 4,400 affordable housing units and has loans in process on over 700 more affordable housing units. Total loans made and loans in process total \$328 million.

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